

UNITED STATES DISTRICT COURT

for the
Middle District of North Carolina

In the Matter of the Search of

*(Briefly describe the property to be searched
or identify the person by name and address)*

8303 TROTINGTON ROAD, STOKESDALE,
NORTH CAROLINA 27357

Case No. 1:22MJ 451

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property *(identify the person or describe the property to be searched and give its location)*:

See Attachment A

located in the Middle District of North Carolina, there is now concealed *(identify the person or describe the property to be seized)*:

See Attachment B

The basis for the search under Fed. R. Crim. P. 41(c) is *(check one or more)*:

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. §§ 115(a)(1)(A) and 115(a)(1)(B);	Attempting, Conspiring, or Threatening to murder a Federal law enforcement officer w/ intent to impede, intimidate, or interfere, or retaliate against the officer;
18 U.S.C. § 875(c)	Transmit a communication in interstate commerce with a threat to injure a person

The application is based on these facts:

See Affidavit

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of days *(give exact ending date if more than 30 days)* is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

/S/ Max S. Wooten

Applicant's signature

Max S. Wooten, Task Force Officer, FBI

Printed name and title

On this day, the applicant appeared before me via reliable electronic means, that is by telephone, was placed under oath, and attested to the contents of this Application for a search warrant in accordance with the requirements of Fed. R. Crim. P. 4.1.

Date: 11/10/2022

City and state: Winston-Salem, North Carolina

Joi Elizabeth Peake
Judge's signature

Joi Elizabeth Peake, U.S. Magistrate Judge

Printed name and title

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A SEARCH
WARRANT FOR 8303 TROTINGTON RD, STOKESDALE, NC**

I, Max S. Wooten, being duly sworn, hereby depose and state as follows:

INTRODUCTION

1. Your Affiant is employed as a Corporal with the Winston-Salem Police Department (WSPD) and has been so employed since 2004. I am currently assigned to the Charlotte Division, Greensboro Resident Agency Office of the Federal Bureau of Investigation as a Task Force Officer (TFO), and have been so since November 2012. In this capacity, I am authorized to investigate matters involving violations of federal law. I hold the Advanced Law Enforcement Certificate issued by the North Carolina Criminal Justice Training and Education Standards Commission.

2. Your Affiant has conducted and assisted with numerous investigations involving the commission of violent crimes, such as shootings, aggravated assaults, threatening communications, etc. Through instruction, training, experience, participation in investigations, and the exchange of information with other law enforcement, your Affiant has become familiar with the manner in which people commit these violent acts and the methods, language, and terms that are used to further their criminal activities.

3. The facts in this Affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This Affidavit is intended to show merely that there is sufficient probable cause for

the requested warrant and does not set forth all of your Affiant's knowledge about this matter.

4. This Affidavit is made in support of an application for a warrant to search the premises described as at 8303 Trottington Road, Stokesdale, North Carolina 27357 (the "Subject Premises"), which is more fully described in Attachment A, and which located within the Middle District of North Carolina. This Affidavit is based upon information I have gained through this investigation, as well as information from other law enforcement officers and individuals associated with this investigation. I have set forth facts that I believe are necessary to establish probable cause to believe that violations of 18 U.S.C. § 115(a)(1)(B) (threatening to assault or murder a Federal law enforcement officer with intent to impede, intimidate, or interfere, or with intent to retaliate against the officer), 18 U.S.C. § 875(c) (transmit in interstate commerce a communication containing a threat to injure another person), and 18 U.S.C. § 115(a)(1)(A) (attempt or conspire to assault, kidnap, or murder a Federal law enforcement officer), have been or are being committed by Stephen Jike Williams, and that that evidence of these crimes, contraband, fruits of these crimes, or other items illegally possessed, and property designed for use, intended for use, or used in committing these crimes will be found at and within the Subject Premises.

5. The information contained in this affidavit is provided for the limited purpose of establishing probable cause in support of a search warrant for the "Subject Premises" described herein and in Attachment A; therefore, I have not included each

and every fact known to me concerning this investigation.

JURISDICTION

6. A “magistrate judge with authority in the district . . . has authority to issue a warrant to search for and seize a person or property located within the district.” Fed. R. Crim. P. 41(b)(1). A search and seizure warrant may be “issued for any of the following: (1) evidence of a crime; (2) contraband, fruits of crime, or other items illegally possessed; (3) property designed for use, intended for use, or used in committing a crime; or (4) a person to be arrested or a person who is unlawfully restrained.” Rule 41(c).

RELEVANT STATUTES

7. 18 U.S.C. § 115(a)(1)(A) criminally punished “Whoever . . . assaults, kidnaps, or murders, or *attempts or conspires to kidnap or murder* . . . a Federal law enforcement officer . . . with intent to impede, intimidate, or interfere with such . . . law enforcement officer while engaged in the performance of official duties, or with intent to retaliate against such . . . law enforcement officer on account of the performance of official duties.” (emphasis added).

8. 18 U.S.C. § 115(a)(1)(B) criminally punishes “Whoever . . . threatens to assault, kidnap, or murder . . . a Federal law enforcement officer . . . with intent to impede, intimidate, or interfere with such . . . law enforcement officer while engaged in the performance of official duties, or with intent to retaliate against such . . . law enforcement officer on account of the performance of official duties.”

9. 18 U.S.C. § 875(c) criminally punishes “Whoever transmits in interstate

or foreign commerce any communication containing any threat to kidnap any person or any threat to injure the person of another . . .”

PROBABLE CAUSE

10. On September 19, 2022, The Good Information Foundation¹ received an email from Stephen Williams via email address jike7XXX@gmail.com.² The title of the email was “Cease and desist all operations.” The body of the email reads as follows:

You are hereby ordered by we the people under the laws of the constitution to cease and desist all defamation and slander of Maga Republicans and Donald Trump. This is Treason an act of war and we will treat you accordingly. You have till the end of the month to print a retraction whistle blow on yourself or I will shut you down personally. Lethal action will be necessary if any physical detainment is attempted when I shut you down. Leave peacefully or your children will forget who you are.

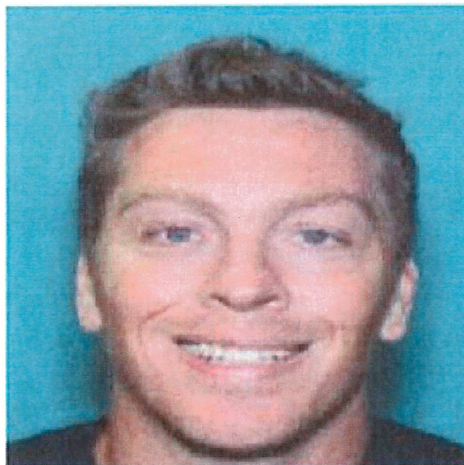
11. After receiving the email, personnel with The Good Information Foundation provided the email to their attorney, J.B. After that, J.B. provided the email to Special Agent (SA) [REDACTED] of the Washington Field Office of the FBI. Based on the verbiage that lethal action would be taken if the business did not cease and desist

¹ Based on my review of publicly available information, I know that the Good Information Foundation is a non-profit organization created in 2021 to “tackle the growing information crisis in America that is undermining social trust, harming public health, and damaging the United States democracy. The mission of The Good Information Foundation is to increase the flow of good, factual information that will counter and rebut the misinformation and disinformation.” See goodinfofoundation.org, last accessed on October 12, 2022.

² This email has been partially redacted by using XXXX to mask some of the numbers in the email address, which appear to correspond with Stephen Jike Williams’s date of birth, to protect this personal identifiable information.

all defamation and slander of MAGA³ Republicans and Donald Trump, an investigative assessment was generated by SA [REDACTED] so further investigation could be done regarding the comments in the email and Williams's intent behind the comments.

12. Through law enforcement database searches, FBI personnel identified Stephen Jike Williams, date of birth X/XX/XXXX, residential address of 8303 Trottington Road, Stokesdale, North Carolina, as being the individual that sent the email.⁴ FBI personnel also located the following photo for Williams in the North Carolina Department of Motor Vehicles database:



13. On or about September 23, 2022, after determining that Williams resides in North Carolina, the Washington Field Office of the FBI forwarded the

³ MAGA is an abbreviation for "Make America Great Again," the campaign slogan for Donald Trump's successful 2016 presidential campaign.

⁴ This Gmail account contains "Jike" in the email address, Williams's middle name, as well as his date of birth. Additionally, the contact detail with the email address was the name Stephen Williams.

investigative assessment to the Greensboro Resident Agency Office of the FBI for further investigation.

14. On October 3, 2022, a female FBI Special Agent (SA) (hereinafter "Special Agent 1") and a male FBI Task Force Officer (TFO) (hereinafter "TFO 1") of the FBI's Greensboro Resident Agency, who are both sworn federal law enforcement officers, attempted to interview Williams at his residence, 8303 Trottington Rd, Stokesdale, which is in Guilford County, within the Middle District of North Carolina. They were driving an unmarked vehicle and were not wearing any clothing with law enforcement markings. TFO 1 and Special Agent 1 planned to approach Williams's residence utilizing the front door and conduct a knock and talk interview. The front door was accessible by walking from the driveway along a concrete pathway to the front porch. TFO 1 and Special Agent 1 parked behind Williams's truck in the center of the driveway approximately 84 feet from the house. There were no gates or fences prohibiting entry on to Williams's property or driveway. There were no signs posted saying "No Trespassing."

15. Upon pulling into the driveway, Special Agent 1 and TFO 1 observed Williams exit his front porch and run towards TFO 1's vehicle. He immediately shouted, "Why the fuck are you on my property?" Special Agent 1 identified herself as an FBI agent with her credentials, which instantly made Williams very angry, and he began yelling that the Department of Justice and the FBI hired a Russian agent to steal the election. Williams screamed multiple times, "Get the fuck off my property!" TFO 1 identified himself as being with the Guilford County Sheriff's Office.

Williams briefly turned his attention to TFO 1, but then refocused his attention back on Special Agent 1 and kept screaming and spitting⁵ on her through the window of TFO 1's vehicle. Special Agent 1 asked Williams why he was so upset, and all Williams would do was lean in the window of TFO 1's vehicle and scream. TFO 1 advised Williams to stop spitting on Special Agent 1. Williams stepped back and continued being irate and hostile.

16. Williams called Special Agent 1 a "bitch" multiple times and stated TFO 1 should arrest Special Agent 1 and have her executed for treason and sedition. Williams stated to Special Agent 1, "I'm going to take you out." TFO 1 asked Williams to clarify what he meant by that comment. He told TFO 1 that "you know what I meant." TFO 1 advised if he was threatening to kill or harm a federal agent, he would be charged for threatening a federal agent. Williams failed to explain whether he meant something other than killing or harming the federal agent and instead asked if Special Agent 1 or TFO 1 had a search warrant.⁶ TFO 1 and Special Agent 1 advised they did not have a search warrant, and Williams again said, "get the fuck off of my property!" Williams continued screaming this, so Special Agent 1 and TFO 1 then left Williams's residence without conducting an interview regarding Williams's threat of lethal action in the email received by The Good Information Foundation (*see supra* Paragraph 8).

⁵ Williams was screaming in such a manner and in close proximity to Special Agent 1, that particles of saliva landed on her as he was screaming at her. "Spitting" as used in this affidavit has that meaning.

⁶ See Paragraph 27 below, regarding Williams's comments about shooting FBI agents in the face.

17. On October 6, 2022, Special Agent 1 called [REDACTED] of The Good Information Foundation and advised her that Williams was not interviewed due to his irate behavior. During their conversation, Special Agent 1 learned that Williams's email to The Good Information Foundation was in response to a TikTok video made by a social media influencer that was asked by The Good Information Foundation to produce anti-Trump rhetoric. In the video, the influencer exposed that The Good Information Foundation was paying influencers to post videos and requiring them to use preestablished talking points, one of which the representative of the Foundation could not provide any factual support for. [REDACTED] told Special Agent 1 that The Good Information Foundation hired an outside company to hire social media influencers to create videos that aligned with their information and beliefs about former President Donald Trump. [REDACTED] advised Special Agent 1 that The Good Information Foundation received multiple emails in response to the TikTok video, but Williams's email was the most egregious.

18. On October 7, 2022, the FBI National Threat Operations Center (NTOC) received a submission from a complainant named J.K. J.K. reported that they had observed a TikTok video in which a male subject was threatening to kill FBI agents. J.K. provided NTOC personnel a link to the TikTok video, and advised the video was posted approximately 17 hours before J.K. observed it. The link was uploaded to the investigative assessment already being investigated by the Greensboro Resident Agency of the FBI.

19. On October 8, 2022, Special Agent 1 contacted J.K. by phone about the TikTok video. J.K. resides outside the state of North Carolina. J.K. indicated they were very disturbed by the video and provided Special Agent 1 a screenshot from the video that showed the TikTok username to be “@jikewilliamsofficial.” The screenshot clearly indicated the video J.K. was referring to was containing the threats made by Williams, which is described in the next paragraph.

20. On October 9, 2022, Special Agent 1 provided TikTok Inc. a preservation letter for the TikTok video posted by Williams. Your Affiant, along with other FBI personnel, reviewed the video and determined that Williams had posted a TikTok video regarding the encounter with the FBI on October 3, 2022. The video is entitled “Fuck the FBI.” Williams said, “The FBI showed up at my house the other day, Monday, a female agent along with a Sheriff.” Williams proceeded to make statements about how the FBI is corrupt, and all agents are considered to be “enemy combatants.” The video lasted two minutes and eighteen seconds. The video appeared to be filmed in the living room of a residence. In the video, Williams made the following relevant statements:

FBI showed up at my house the other day, Monday. Female agent along with a sheriff—not packing like that—um, didn’t have a warrant, asking me questions about e-mails that I sent

. . . .

The FBI, at this point in time, has no jurisdiction. If they come to your home, point your weapon at them, open fire on them, and take them out. They are enemy combatants. By the Constitution, they are enemy combatants.

. . . .

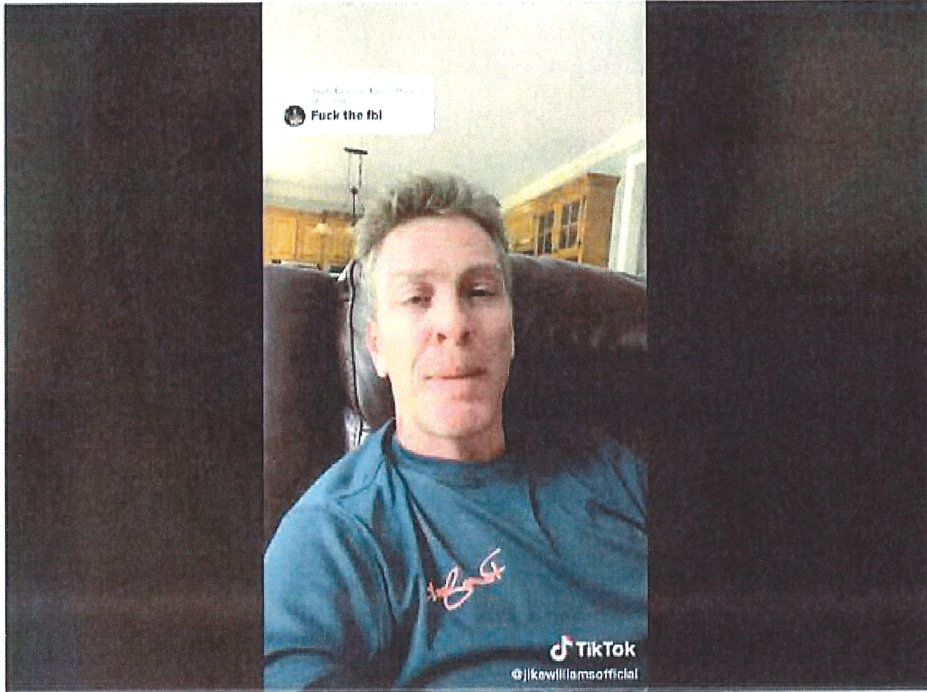
Wake up America. Listen, if the FBI—I told the FBI, if you come back, come hot. And if they try to surround my house like that, you tell that fat son of a bitch, Boy, you're a big fucking target. I got a fucking .308.⁷ I'll take that AK-47 from you when I'm done and use it to kill the rest of those motherfuckers and make it look like you did it.

I'm not playing with the fucking FBI. They've been put on fucking notice, if you step back foot on my fucking property, I ain't gonna sit there and talk to you. I'm going to bust your fucking head open with fucking .308s man. I'm going to kill every single one of you, stack you up in your cars and drive you back to headquarters and finish the fucking job.

Fuck the FBI. They are working with foreign agents, they are a corrupt organization, they have no jurisdiction, they have thrown us into basically World War III. We are literally now, at the precipice of World War III with Russia because of their corruption, their failure to investigate corruption, and they are complicit with the death of Ukrainians, of the United States Americans who are going over there and getting killed. They are absolutely out of control. Stand up to em, fight em, shoot em on sight.

21. Below is a screenshot from the video, clearly showing the subject in the video is Stephen Mike Williams.

⁷ Here, .308 appears to refer to a .308 caliber rifle. .308 caliber ammunition is commonly used in applications including military, law enforcement, competitive sport shooting, and hunting. This caliber is commonly used in rifles for long-range precision shooting.



22. TFO 1 reviewed the video, specifically the statements where Williams referred to a "fat son of a bitch" and "Boy, you're a big fucking target." TFO 1 was not sure who Williams was referring to since Williams's threats were primarily directed at FBI agents and TFO 1 identified himself as a sheriff's deputy.

23. On October 13, 2022, your Affiant located two TikTok videos posted by Williams utilizing username @jikewilliamsofficial. One video was titled "You're 100% right." The other video was titled "no they don't. it's irresponsible and unsportsmanlike, the chance of wounding is way too high." The following are details related to each video:

a. Video "You're 100% right":

This TikTok video shows Williams speaking in the living room of a residence, and the video appears to have been recorded in response to a comment posted by username domicky; however, that comment was not

accessible. According to a timeline on the bottom portion of the screen, the video was posted 2 days prior, on October 11, 2022. In Williams's video, he agreed with what was said in the other video regarding the FBI. Williams said the FBI was at his house "last Monday, eight days ago." He stated the FBI did not know he had a fiancé but thought he was a single white male living in poverty, because he reduced his salary. Williams stated the FBI "came out with a female agent and a county sheriff, and they came out unarmed, which was their first mistake." Williams said he "punked" the FBI, "stood them down, kicked them out of the yard," told the FBI not to ever come back, and accused them of treason, sedition, and conspiracy to overthrow the government.

b. Video "no they don't. it's irresponsible and unsportsmanlike, the chance of wounding is way too high":

This TikTok video shows Williams speaking in what appears to be a garage area of a residence, and he is replying to a comment made by username 383obs1998. Your Affiant did not view that comment.⁸

It appears Williams was criticizing viewers for their criticism of a previous TikTok video related to long-range shooting. In Williams's video, he states the person in the original shooting video was probably shooting a .338, not a .308. Williams stated, "you better watch your mouth, I've trained with guys like this dude" (referring to the original shooting video) and "he can shoot

⁸ The timeline on the bottom portion of the screen indicated the video was posted 3 days ago; however, your Affiant did not capture a screenshot until October 14. Therefore, this video appears to have been posted the same day as the other video, October 11.

better than you, he can shoot better than me.” Based on Williams’s comments in the video, Williams has training and knowledge of firearms.

24. On or about October 24, 2022, your Affiant observed another TikTok video posted by Williams. Your Affiant did not recall the name of the video, but while reviewing it, your Affiant heard Williams state (paraphrased) that the FBI was corrupt. He further stated that he did not want another “1776” but only wanted peace. Your Affiant attempted to download the video on October 31, 2022; however, your Affiant could not locate the video, most likely due to Williams’s @jikewilliamsofficial account being suspended by TikTok.

25. On October 31, 2022, your Affiant reviewed other TikTok videos posted by Williams to determine if Williams had made any additional threats towards the FBI or other law enforcement personnel. Your Affiant located a video posted by Williams utilizing account @jikewilliams. The video was titled “On the back of you money the the pyramid the saying underneath it says “new world order” and the eye on top of the pyramid is for the Secret society”. The video was posted two days prior, October 29, 2022. In the video, Williams stated he was in his garage. He stated his accounts had been banned and the FBI came to his house on October 3rd. He then preceded to make the following threatening comments in substance and in part:

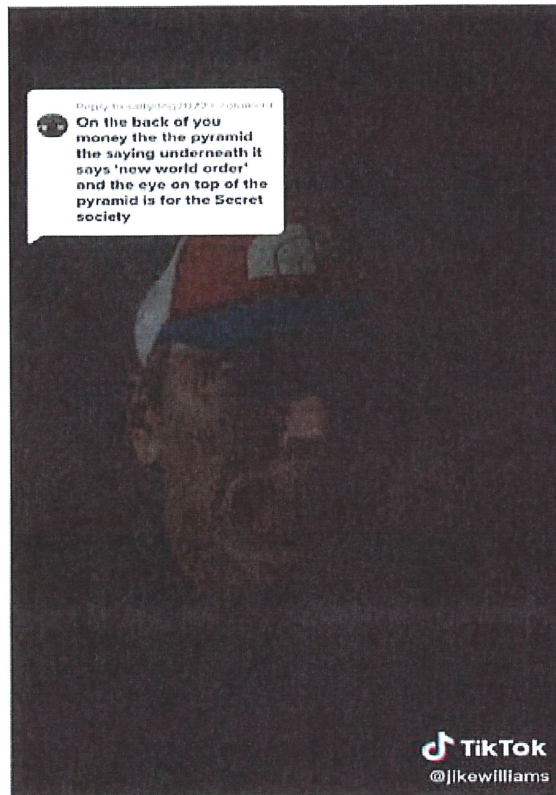
Listen to me. Stand fucking strong. Pull out your fucking weapons. Fight your federal agents. They left my home. Nobody died. Thank God. Thank God. But I stood'em down. And listen y'all, it's like this. These people wanna come over here and start fucking problems with people like me who was just telling the truth, like this lady. They say I'm crazy, right. [(The camera pans to a table that has something black in color lying on it.)] I'm not fucking crazy, I'm ready for a fucking fight. And I'm not ready to fucking go to Ukraine and fight Russia. I'm

ready to shoot fucking FBI agents, CIA agents, and any federal law enforcement agent working for Joe Biden or anybody like Klaus Schwab . . . Australian police, any of them. Execute those motherfuckers on sight. If they wanna fucking de-populate, de-populate *them*.

You fu— . . . I-I-I love y'all on this TikTok shit, whatever, but they're gonna censor the truth. They're gonna shut you down. You're . . . you sound like you're in Europe. What the fuck is the CEO of Pfizer still doing fucking breathing? If I was in a hundred—a thousand yards of that motherfucker, he'd be spitting his fucking teeth out of his mouth. Cause I would shoot him with a three-oh-eight (.308) in the fucking mouth. TikTok is promoting vaccinations, which is death. But they won't—they won't let you—they won't let you put this motherfucker on here. Right? [(Williams holds what appears to be a handgun in a holster up to the camera.)] They won't let you pull—pull this—this motherfucker out [(Williams picks up what appears to be a magazine for a semi-automatic rifle and holds it up to the camera)] and the rifles that are in my fucking— . . . they won't let me show you that, but they'll show you a fucking syringe that kills little kids in their sleep.

They wanna take away our weapons. They wanna take away our ability to communicate. And they wanna do it and they wanna watch y'all bitch and complain and watch me bitch and complain so they know where we're at when it's time to purge us. So, you damn well better start gettin' your fucking weapons ready, start calling your fucking government like I do . . . tell them motherfuckers where they can stick it, and dare'em to fucking bring a fight. And kill every fucking one of'em that you can. Cause we should've did that to the Nazis in 1938, and we didn't. And a hundred million people died. Should've killed Hitler as soon as he took Munich. But you're fucking cowards and you're TikTok. Fucking fight man. Fight!

26. On October 31, 2022, your Affiant provided TikTok a preservation request for account @jikewilliams. Below is a screenshot from the aforementioned video:



27. On November 1, 2022, your Affiant obtained a query from the North Carolina Department of Motor Vehicles for Williams. Williams's address listed in the query was 8303 Trottington Rd, Stokesdale, North Carolina. Additionally, your Affiant confirmed with the Guilford County Sheriff's Office that Williams has a valid concealed carry permit that was issued in November 2018.

28. As stated in this Affidavit, your Affiant is familiar with different calibers of firearms and knows from his training and experience that calibers such as a .308 are capable of shooting high velocity rounds and can hit targets from a significant distance. Your Affiant also knows from the TikTok videos made by Williams that he mentions firearms, specifically a .308, numerous times. Your Affiant also knows from the video on October 29, 2022 that Williams appears to be holding a handgun and a

semi-automatic rifle magazine during the video. In the video, Williams says, “They won’t let you pull—pull this—this motherfucker out [(Williams picks up what appears to be a magazine for a semi-automatic rifle and holds it up to the camera)] and the rifles that are in my fucking— . . .” Based on these facts, your Affiant has probable cause to believe that Williams possesses a .308 caliber rifle, a pistol, rifles, and possibly other firearms that could be used to assault federal law enforcement officers.

29. As such, the handgun and magazine shown in the video on October 29, 2022, constitute instrumentalities of the crime, as they were used as part of the video to communicate Williams’s threats to FBI agents. Further, rifles, including a .308 caliber rifle, in Williams’s possession at his residence where the videos were apparently made and where he first encountered Special Agent 1 in his driveway, would be evidence of the crimes, as each crime requires proof of a true threat, which “encompass those statements where the speaker means to communicate a serious expression of an intent to commit an act of unlawful violence to a particular individual or group of individuals.” *Virginia v. Black*, 538 U.S. 343, 359 (2003).

30. On November 8, 2022, FBI personnel notified your Affiant of a new video recorded by Williams and posted to @jikewilliams the same day, November 8, 2022. The title of this video was “Heres what confuses me, why is it more believable of some random call than a man who says he is just watering flowers who is actually watering flower,” and the video appeared to be in response to a comment made by TikTok user “aethelc.” Williams is standing in what appears to be a driveway on the side of a brick multi-level residence consistent with the Subject Premises.

31. In this video, Williams starts the video by making demeaning comments about police officers in regards to their education and intelligence. Williams then makes the following comments in substance and in part, regarding the FBI:

FBI came over here on Monday, October 3rd. I didn't end up in handcuffs cause I told them motherfuckers I would shoot them in the fucking face. And I will.

Williams then proceeded to make more demeaning and critical comments about other police officers who had an encounter with a pastor. Then, Williams made the following additional comments in substance and in part related to his own encounter with the FBI on October 3, 2022:

See, when they came here, I come up on em with a fucking pistol. What are you doin' here? Uh, you sent an email . . . you damn right I sent a email. You guys paid a Russian agent to overthrow the U.S. government. Danchenko . . . the FBI paid a Russian agent, not suspicion, testified to in court, so get the fuck off my property before I ta— . . . I declare you a . . . an enemy combatant, cause it's my duty to handle you here and now. Y'all need to learn to get some fucking balls on ya.

. . .

Now I'm not saying go out here and commit crimes, and I'm not advocating the shooting of police officers. But you fucking police officers better start fucking gettin' the egos in check. You were nothing in high school. You didn't . . . probably barely graduated college. And just because you look decent in a uniform and you're carrying a weapon . . . ya . . . ya need to bring the ego down. You're not more important than anybody else. Matter of fact, motherfucker, if you come over here to my house pulling shit like that, you gonna be a fuckin' memory. You gonna be in a obituary.

And any FBI agent out there, I'm taking your fuckin' wallets, I'm gonna let your children and wi . . . and, and wives live, but I'm gonna burn down everything you fuckin' own. Just like you're doin' to this fuckin' country. That goes to any FBI agent that out here who wants to from it . . . come and, come and flex on this motherfucker.

Look around you, boy. [(Williams pans the camera around his property and shows his yard.)] I got bunkers out here. Fuckin' . . . I'm fuckin' John Rambo, but smaller, I hide in holes . . . come up and fuckin'

. . . like a fuckin' snake. Come over here to my fuckin' house. Fuck that shit. Fuck the FBI.

32. Below are two screenshots from the video. The first screenshot shows Williams speaking in the video. The second screenshot shows Williams's property where he referenced having bunkers and lying in wait for law enforcement.





33. The evidence as described above shows that Williams has been exchanging communications with other persons on TikTok. Williams has also stated that he is ready to fight and kill FBI agents: "I'm ready for a fucking fight. And I'm not ready to fucking go to Ukraine and fight Russia. I'm ready to shoot fucking FBI agents, CIA agents, and any federal law enforcement agent working for Joe Biden . . . any of them. Execute those motherfuckers on sight." Additionally, Williams has called on other unknown persons on TikTok to "Stand up to em, fight em, shoot em on sight." Accordingly, there is probable cause to believe that Williams could be planning, preparing for, or conspiring with other unknown persons to commit an attack on Federal law enforcement officers, or FBI offices or buildings in violation of 18 U.S.C. § 115(a)(1)(A).

TECHNICAL TERMS

34. Based on my training and experience, I use the following technical terms to convey the following meanings:

- a. Wireless telephone: A wireless telephone (or mobile telephone, or cellular telephone) is a handheld wireless device used for voice and data communication through radio signals. These telephones send signals through networks of transmitter/receivers, enabling communication with other wireless telephones or traditional "land line" telephones. A wireless telephone usually contains a "call log," which records the telephone number, date, and time of calls made to and from the phone. In addition to enabling voice communications, wireless telephones offer a broad range of capabilities. These capabilities include: storing names and phone numbers in electronic "address books;" sending, receiving, and storing text messages and e-mail; taking, sending, receiving, and storing still photographs and moving video; storing and playing back audio files; storing dates, appointments, and other information on personal calendars; and accessing and downloading information from the Internet. Wireless telephones may also include global positioning system ("GPS") technology for determining the location of the device.
- b. Digital camera: A digital camera is a camera that records pictures as digital picture files, rather than by using photographic film. Digital cameras use a variety of fixed and removable storage media to store

their recorded images. Images can usually be retrieved by connecting the camera to a computer or by connecting the removable storage medium to a separate reader. Removable storage media include various types of flash memory cards or miniature hard drives. Most digital cameras also include a screen for viewing the stored images. This storage media can contain any digital data, including data unrelated to photographs or videos.

- c. Portable media player: A portable media player (or “MP3 Player” or iPod) is a handheld digital storage device designed primarily to store and play audio, video, or photographic files. However, a portable media player can also store other digital data. Some portable media players can use removable storage media. Removable storage media include various types of flash memory cards or miniature hard drives. This removable storage media can also store any digital data. Depending on the model, a portable media player may have the ability to store very large amounts of electronic data and may offer additional features such as a calendar, contact list, clock, or games.
- d. GPS: A GPS navigation device uses the Global Positioning System to display its current location. It often contains records the locations where it has been. Some GPS navigation devices can give a user driving or walking directions to another location. These devices can contain records of the addresses or locations involved in such navigation. The

Global Positioning System (generally abbreviated "GPS") consists of 24 NAVSTAR satellites orbiting the Earth. Each satellite contains an extremely accurate clock. Each satellite repeatedly transmits by radio a mathematical representation of the current time, combined with a special sequence of numbers. These signals are sent by radio, using specifications that are publicly available. A GPS antenna on Earth can receive those signals. When a GPS antenna receives signals from at least four satellites, a computer connected to that antenna can mathematically calculate the antenna's latitude, longitude, and sometimes altitude with a high level of precision.

- e. PDA: A personal digital assistant, or PDA, is a handheld electronic device used for storing data (such as names, addresses, appointments or notes) and utilizing computer programs. Some PDAs also function as wireless communication devices and are used to access the Internet and send and receive e-mail. PDAs usually include a memory card or other removable storage media for storing data and a keyboard and/or touch screen for entering data. Removable storage media include various types of flash memory cards or miniature hard drives. This removable storage media can store any digital data. Most PDAs run computer software, giving them many of the same capabilities as personal computers. For example, PDA users can work with word-processing documents, spreadsheets, and presentations. PDAs may also include

global positioning system ("GPS") technology for determining the location of the device.

- f. Tablet: A tablet is a mobile computer, typically larger than a phone yet smaller than a notebook, that is primarily operated by touching the screen. Tablets function as wireless communication devices and can be used to access the Internet through cellular networks, 802.11 "wi-fi" networks, or otherwise. Tablets typically contain programs called apps, which, like programs on a personal computer, perform different functions and save data associated with those functions. Apps can, for example, permit accessing the Web, sending and receiving e-mail, and participating in Internet social networks.
- g. Pager: A pager is a handheld wireless electronic device used to contact an individual through an alert, or a numeric or text message sent over a telecommunications network. Some pagers enable the user to send, as well as receive, text messages.
- h. IP Address: An Internet Protocol address (or simply "IP address") is a unique numeric address used by computers on the Internet. An IP address is a series of four numbers, each in the range 0-255, separated by periods (e.g., 121.56.97.178). Every computer attached to the Internet computer must be assigned an IP address so that Internet traffic sent from and directed to that computer may be directed properly from its source to its destination. Most Internet service providers

control a range of IP addresses. Some computers have static—that is, long-term—IP addresses, while other computers have dynamic—that is, frequently changed—IP addresses.

- i. Internet: The Internet is a global network of computers and other electronic devices that communicate with each other. Due to the structure of the Internet, connections between devices on the Internet often cross state and international borders, even when the devices communicating with each other are in the same state.

ELECTRONIC STORAGE AND FORENSIC ANALYSIS

35. Based on my knowledge, training, and experience, I know that electronic devices, including computers, laptops, cellular telephones, and smartphones, can store information for long periods of time. Similarly, things that have been viewed via the Internet are typically stored for some period of time on the device. This information can sometimes be recovered with forensic tools.

36. *Forensic evidence.* As further described in Attachment B, this application seeks permission to locate not only electronically stored information that might serve as direct evidence of the crimes described on the warrant, but also forensic evidence that establishes how the CELL PHONE was used, the purpose of its use, who used it, and when. There is probable cause to believe that this forensic electronic evidence might be on the CELL PHONE because:

- a. Data on the storage medium can provide evidence of a file that was once on the storage medium but has since been deleted or edited, or of a

deleted portion of a file (such as a paragraph that has been deleted from a word processing file).

- b. Forensic evidence on a device can also indicate who has used or controlled the device. This “user attribution” evidence is analogous to the search for “indicia of occupancy” while executing a search warrant at a residence.
- c. A person with appropriate familiarity with how an electronic device works may, after examining this forensic evidence in its proper context, be able to draw conclusions about how electronic devices were used, the purpose of their use, who used them, and when.
- d. The process of identifying the exact electronically stored information on a storage medium that is necessary to draw an accurate conclusion is a dynamic process. Electronic evidence is not always data that can be merely reviewed by a review team and passed along to investigators. Whether data stored on a computer is evidence may depend on other information stored on the computer and the application of knowledge about how a computer behaves. Therefore, contextual information necessary to understand other evidence also falls within the scope of the warrant.
- e. Further, in finding evidence of how a device was used, the purpose of its use, who used it, and when, sometimes it is necessary to establish that a particular thing is not present on a storage medium.

37. *Nature of examination.* Based on the foregoing, and consistent with Rule 41(e)(2)(B), the warrant I am applying for would permit the examination of CELL PHONES consistent with the warrant. The examination may require authorities to employ techniques, including but not limited to computer-assisted scans of the entire medium, that might expose many parts of the device to human inspection in order to determine whether it is evidence described by the warrant.

38. *Manner of execution.* The search of any CELL PHONE seized pursuant to this warrant will be conducted within a reasonable time and without unreasonable delay.

CONCLUSION

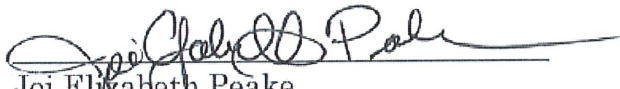
39. Based on the above, your Affiant has probable cause to believe that Stephen Jike Williams, communicated in person and via TikTok, threats to assault and murder FBI agents, specifically in response to the attempted interview on October 3, 2022. Further, Stephen Jike Williams threatened to murder Special Agent 1 while at the Subject Premises, stating, "I'm going to take you out." Williams later stated that he was armed with a pistol at the time he made that statement to Special Agent 1. Based on the aforementioned factual information, your Affiant respectfully submits there is probable cause to believe that evidence of these crimes, contraband, fruits of these crimes, or other items illegally possessed, and property designed for use, intended for use, or used in committing these crimes, which is more fully described in Attachment B, will be found at and within the Subject Premises described in Attachment A.

40. Based on the forgoing, your Affiant requests that the Court issue the proposed search warrant.

Respectfully submitted,

/s/ Max S. Wooten
Max S. Wooten
Task Force Officer
Federal Bureau of Investigation

In accordance with Rule 4.1(b)(2)(A), the Affiant attested under oath to the contents of this Affidavit, which was submitted to me by reliable electronic means, on this 10 day of November, 2022, at 4:17 a.m./p.m.

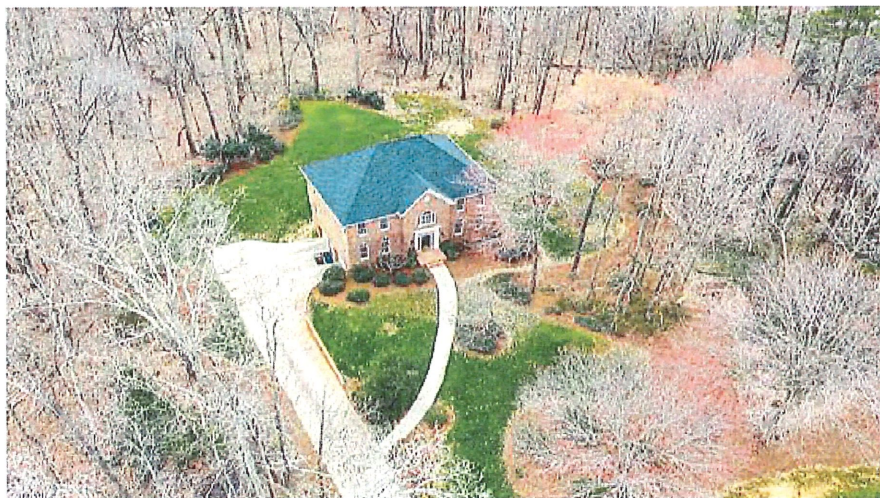

Joi Elizabeth Peake
United States Magistrate Judge

ATTACHMENT A

Property to Be Searched

("Subject Premises")

This warrant applies to the residence located at 8303 Trottington Rd, Stokesdale, NC 27357. The residence is a multi-level brick dwelling located on the south side of the street. The residence has a basement with what appears to be a 2-car garage. A concrete sidewalk leads from the driveway to the front door. The numbers "8303" are displayed on the front door and on the mailbox at the end of the driveway. The property may contain hidden bunkers, which may be searched for, and if found, may be searched pursuant to this warrant.





ATTACHMENT B

Particular Property to be Seized

All property, items, records, and information related to violations of 18 U.S.C. § 115(a)(1)(B) (threatening to assault or murder a Federal law enforcement officer with intent to impede, intimidate, or interfere, or with intent to retaliate against the officer), 18 U.S.C. § 875(c) (transmit in interstate commerce a communication containing a threat to injure another person), and 18 U.S.C. § 115(a)(1)(A) (attempt or conspire to assault, kidnap, or murder a Federal law enforcement officer) (hereinafter the "Subject Offenses"), located at the Subject Premises described in Attachment A, that constitute evidence of these crimes, contraband, fruits of these crimes, or other items illegally possessed, or instrumentalities of these crimes, committed by or involving Stephen Jike Williams, in the form of:

- a. Firearms, ammunition, and firearm accessories that constitute evidence of, or instrumentalities of, the Subject Offenses as follows:

- i. A semi-automatic pistol matching the appearance of the handgun used by Williams in the October 29, 2022 TikTok video, or pistols which could have been concealed on Williams's person on October 3, 2022 when he encountered Special Agent 1 in his driveway, as well as any holsters or ammunition that correspond with or could be used with that pistol or those pistols;
 - ii. Any rifles located on the Subject Premises, including .308 caliber rifles, and any parts, accessories, or ammunition that correspond with, could be used with, or could be attached to those rifles;
 - iii. A rifle magazine matching the appearance of the rifle magazine used by Williams in the October 29, 2022 TikTok video, and any ammunition contained within it, or that corresponds with or could be loaded into it;
- b. Any body armor, bullet proof vests, or tactical gear that could be used by an attacker in an assault on a Federal law enforcement officer;
- c. A red and white "The North Face" brand baseball cap worn by Williams in the October 29, 2022 and November 8, 2022 TikTok videos;
- d. Photographs of the exterior and the interior rooms of the Subject Premises to establish locations where the TikTok videos containing threats against Federal law enforcement officers were filmed;
- e. Photographs of the location and appearance of any bunkers located on the Subject Premises;

- f. Documentation of ownership, purchase, or procurement of firearms, ammunition, and firearm accessories, and documents or records showing Williams was performing research on destructive devices, weapons, firearms, bombs, or other similar devices and their use for making an attack or for booby-trapping his premises;
- g. Documents and any other indicia of ownership or control over the Subject Premises;
- h. Documents and any other indicia of ownership or control over cellular phones and electronic devices found at the Subject Premises;
- i. Physical documents, papers, or receipts for purchases of goods, relating to Williams's online threats towards Federal law enforcement officers, or which demonstrate that Williams was planning, preparing for, or conspiring with other unknown persons to commit an attack on Federal law enforcement officers, or FBI offices or buildings, or making efforts to conduct surveillance or research information about Special Agent 1, FBI agents, or FBI offices or buildings;
- j. Safes or secured storage containers that could hold documents and firearms such as those described above in this Attachment, and entry into those safes and secured storage containers by force is authorized by this warrant if such entry cannot easily be achieved by other means;
- k. The seizure, but not the search of electronic devices or computers (other than cellular phones), belonging to Williams and located at the Subject

Premises, that could be used to save or store digital videos, photographs, electronic documents, or social media content;

1. The seizure of cellular telephones or cellular smartphone devices with the capability of recording videos or utilizing the TikTok social media application, belonging to Williams and located at the Subject Premises, and the search of each of those devices (hereinafter "CELL PHONE") for the following evidence:
 - i. Evidence of who used, owned, or controlled the CELL PHONE at the time the things described in this warrant were created, edited, or deleted, such as logs, registry entries, configuration files, saved usernames and passwords, documents, browsing history, user profiles, email, email contacts, "chat," instant messaging logs, photographs, and correspondence;
 - ii. Evidence of the attachment of the CELL PHONE to computers or other electronic storage devices for electronic data or information;
 - iii. Documentation and manuals that may be necessary to access the CELL PHONE or to conduct a forensic examination of the CELL PHONE;
 - iv. Records of or information about Internet Protocol addresses used by the CELL PHONE, and records of or information about the CELL PHONE's connections to any Wi-Fi sources located at the Subject Premises;

- v. Electronic evidence stored on the CELL PHONE, including videos, photographs, text messages, direct messages, or other electronic communications that contain threats against the FBI, FBI agents, or Federal law enforcement officers;
- vi. Electronic evidence stored on the CELL PHONE, including videos, photographs, text messages, direct messages, or other electronic communications that show Williams was planning, preparing for, or conspiring with other unknown persons to commit an attack on Federal law enforcement officers, or FBI offices or buildings, other Federal government targets, or any other terrorist attack; and
- vii. Electronic evidence stored on the CELL PHONE, including videos, photographs, text messages, direct messages, or other electronic communications that demonstrate that Williams owned, possessed, purchased, acquired, transferred, manufactured, stored, trained with, or used firearms, explosives, bombs, or other similar lethal devices that could be used by Williams to commit an assault or murder of FBI agents or Federal law enforcement officers, or could be used to commit an attack on an FBI offices or buildings.

This warrant authorizes a review of electronically stored information, communications, other records and information disclosed pursuant to this warrant in

order to locate evidence, fruits, and instrumentalities described in this warrant. The review of this electronic data may be conducted by any government personnel assisting in the investigation, who may include, in addition to law enforcement officers and agents, attorneys for the government, attorney support staff, and technical experts. Pursuant to this warrant, the FBI may deliver a complete copy of the disclosed electronic data to the custody and control of attorneys for the government and their support staff for their independent review.